Network Telephone Services, Inc. Stability. Experience. Quality.

With new, small, service providers cropping up everywhere, offering all kinds of promises and services, it's easy to get confused. The fact is that Network Telephone Services, Inc. (NTS) is one of the leading service bureaus in the industry. With close to a decade of experience, we handle thousands of numbers and answer hundreds of thousands of calls per day. Our strength lies in having a diverse and always expanding product portfolio that allows our clients the ability to maximize their potential revenues. Be it 800, 900, 976, recorded or live, we answer the calls, process billing, provide 24-hour customer service and detailed daily call reports.

Our clients thrive on access to a variety of applications and services that have been tested for marketability, profitability and technical quality. Our investment in the future of this business goes beyond equipment and technology. We believe that our staff is among the most knowledgeable and capable in the telephony arena.

NTS does all the work and we mean all the work for you! We analyze your programming needs, reserve the phone numbers, help develop your application, hook you up with the best telephone carrier (AT&T, MCI, Sprint, etc.) for your specific program(s), bring you on-line and maintain the entire system.

If it's technology you're interested in, NTS gives you excellent program diversity with Tandem switches, ACDs, PBXs.VRUs, and uniquely designed, adaptable conferencing and product specific platforms. We offer sophisticated ANI and ISDN fraud prevention technology as well as the largest credit card and ANI database of both positive and negative callers.

ACCESS AND CALLER BILLING

Network Telephone Services is unique in the industry because we offer every access and caller billing option available as well as our own proprietary plans. Among them are new programs to strengthen information providers' marketing efforts and increase billable minutes:

"800 Assured Payment Plan"...a traditional Visa/MasterCard billing option that provides the program sponsor with assured payments. NTS and its marketing partner. Frontier Credit, accept responsibility for all bank merchant account tees, credit card processing fees, service bureau costs, access and transport costs, live monitor costs and chargebacks.

NTS introduces the "IBS Calling Card"... a new, unique way for callers to access audiotext programs from anywhere they choose without a credit card.

"No 800 Chargebacks"... a caller billing program with assured payouts to participating IPs and accelerated cash flow with Receivable Financing service.

"Private Billing"... Charges are billed on the callers' monthly telephone bills, itemized on a page that details 900 calls and where a toll free 800 live customer service appears.

"011 International Calling Options"... Calls that originate domestically and terminate internationally are the perfect compliment to 800 or 900 applications and are the answer to calls that fall through the system due to credit denial or ANI negative information. There are no chargebacks ever!

THE BEST LIVE OPERATORS

NTS employs hundreds of live operators at our very own monitoring facility. Every operators' station is furnished with only state-of-the-art equipment. Maximum hold times as well as repeat call-ins are achieved by means of a continuous review process.

24-HOUR LIVE TECHNICAL CUSTOMER SERVICE

The audiotext business never sleeps! We're answering the calls 24 hours a day and we know that our clients need information on their line(s) and their business on an ongoing basis. Our customer service department has the answers and will do everything possible to address your concerns quickly, efficiently and courteously: 24 hours a day everyday. We're also available to consumers 24 hours a day for inquiries and credit services.

OUR COMMITMENT TO THE FUTURE AND YOU

At NTS we offer all the support you'll need to help make your audiotext program a success; be it entertainment, information or business-to-business. One-stop shopping with complete service from installation, advertising support and customization to staffing, management and sophisticated reporting systems. We look forward to the challenges of the future knowing that we'll be there, before the competition!

We welcome the opportunity to work with you on your creative programs and know that together we can make them profitable products.

Put the strength, experience and versatility of NTS to work for you! Call us today, 800-727-6874

CERTIFICATE OF SERVICE

I, Martha Marshalek, hereby certify that the foregoing Comments of Southwestern Bell Telephone Company in Docket 93-22, have been served this 10th day of October, 1994 to the Parties of Record.



Martha Marshalek

October 10, 1994

ITS, Inc. 1919 M Street., N.W., Room 246 Washington, D.C. 20554 Eugene G. Hanes Advisory Staff Alabama Public Service Commission P.O. Box 991 Montgomery, Alabama 36101-0991

Mary Newmeyer Federal Affairs Advisor Alabama Public Service Commission P.O. Box 991 Montgomery, Alabama 36101-0991 P. Michael Cole Attorney Alabama Public Service Commission Patton, Latham, Legge & Cole 315 Market Street P.O. Box 470 Athens, AL 35611-0470

Richard E. Wiley
Michael Yourshaw
Katherine A. King
American Newspaper Publishers
Association
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

W. Terry Maguire
Claudia M. James
Brigette M. Rouson
American Newspaper
Publishers Association
Dulles Airport
P.O. Box 17407
Washington, D.C. 20004

Francine J. Berry
Mark C. Rosenblum
Peter H. Jacoby
American Telephone &
Telegraph Co.
295 North Maple Avenue
Room 3244J2
Basking Ridge, New Jersey 07920

Michael S. Pabian AMERITECH SERVICES, INC. 2000 W. Ameritech Center Dr. 4H76 Hoffman Estates, IL 60196-1025

Andrew D. Lipman
Ann P. Morton
Amrigon Enterprises Inc.
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Danny E. Adams
Jane A. Fisher
Audio Communications, Inc.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

John Thorne
Michael D. Lowe
Attorneys for the Bell Atlantic
Telephone Companies
1710 H Street, N.W., 8th Floor
Washington, D.C. 20006

Helen A. Shockey
BellSouth Corporation
4300 Southern Bell Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30367-6000

Sam Antar
Vice President, Law & Regulation
Kristin C. Gerlach
Senior General Attorney, Law
& Regulation
Capital Cities/ABC, Inc.
77 West 66th Street
New York, NY 10023

Carol F. Sulkes VP-Regulatory Policy Central Telephone Company 8745 W. Higgins Road Chicago, Illinois 60631

David C. Olson
William D. Baskett III
Thomas E. Taylor
Frost & Jacobs
Cincinnati Bell Telephone Company
2500 Central Trust Center
201 E. Fifth Street
Cincinnati, Ohio 45202

Robert J. Aamoth
Reed Smith Shaw & McClay
Competitive Telecommunications
Association
1200 18th Street, N.W.
Washington, D.C. 20036

Genevieve Morelli
VP & General Counsel
Competitive Telecommunications
Association
1140 Connecticut Avenue. N.W.,
Suite 220
Washington, D.C. 20036

Scott Harshbarger
Attorney General
The Commonwealth of Massachusetts
Dept. of the Attorney General
131 Tremont Street
Boston, Massachusetts 02111

Bart Gordon
Congress of the United States
House of Representatives
103 Cannon Building
Washington, D.C. 20515

Richard Blumenthal Attorney General State of Connecticut Office of the Attorney General 55 Elm Street, 7th Floor Hartford, Connecticut 06106 Ken McEldowney
Executive Director
Consumer Action
116 New Montgomery, Ste 233
San Francisco, CA 94105

Steve Merchant General Manager Manor Inn Bethesda 7740 Wisconsin Ave. Bethesda, Maryland 20814

Michael Cannon
Account Manager
C&P Telephone Company of MD
11750 Beltsville Drive
3rd Floor
Beltsville, MD 20705

Ian D. Volner
J. Brian DeBoice
Direct Marketing Association
 Cohn and Marks
1333 New Hampshire Ave., N.W.
Suite 600
Washington, D.C. 20036

Ronald B. Mallard
Fairfax County
Department of Consumer Affairs
12000 Government Center Parkway
Fairfax, Virginia 22035-0001

Richard McKenna GTE Service Corporation 600 Hidden Ridge, E3J36 Irving, TX 75038

Gail L. Polivy 1850 M Street, N.W. Suite 1200 Washington, D.C. 20036 Christopher Herman 610 North Carolina Ave., S.E. Washington, D.C. 20003

Jerry L. Webb
Chief Engineer
Indiana Utility Regulatory
Commission
State Office Building Room 913
Indianapolis, Indiana 46204

Steven J. Metalitz
Angela Burnett
Information Industry Association
555 New Jersey Avenue, N.W.
Suite 800
Washington, D.C. 20001

Earl Nicholas Selby Law Offices of Earl Nicholas Selby Information Providers' Coalition for

Defense of the First Amendment 420 Florence Street, Ste. 200 Palo Alto, California 94301

Frank S. Levin, Esq.
Hall, Dickler, Lawler, Kent &
Friedman
Interactive Telemedia, Inc.
460 Park Avenue
New York, NY 10022-1906

Marilyn Moore
Michigan Public Service
Commission Staff
6545 Mercantile Way
P.O. Box 30221
Lansing, Michigan 48909

Mary J. Sisak
Donald J. Elardo
MCI Telecommunications
Corporation
1133 19th Street, N.W.
Washington, D.C. 20036

Philip F. McClelland
Asst. Consumer Advocate
Pennsylvania Office of
Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Edwin N. Lavergne
Melanie Haratunian
Ginsburg, Feldman and Bress,
Chartered
International Shoppers Spree
1250 Connecticut Ave., N.W.
Washington, D.C. 20036

Andrew D. Lipman
Ann P. Morton
Swidler & Berlin, Chartered
KAOS Communications, Inc.
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

Randy Bakewell
Assistant Public Counsel
Missouri Office of the
Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Helen M. Pohlig, Esq.
Managing Director
National Association for
Information Services
1150 Connecticut Ave., N.W.
Washington, D.C. 20036

National Association of Consumer Agency Administrators 1010 Vermont Ave., N.W. Suite 514 Washington, D.C. 20005 James Bradford Ramsay
Deputy Assistant General Counsel
National Association of
Regulatory
Utility Commissioners
1102 ICC Building
Post Office Box 684
Washington, D.C. 20044

Linda F. Golodner
Executive Director
National Consumers League
815 Fifteenth Street, N.W.
Suite 928N
Washington, D.C. 20005

David Cosson
L. Marie Guillory
National Telephone Cooperative
Association
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

Veronica M. Ahern Nixon, Hargrave, Devans & Doyle One Thomas Circle, N.W. Suite 800 Washington, D.C. 20554

Joel R. Dichter
Seham, Klein & Zelman
Assoc. of Information Providers
of New York
485 Madison Avenue
New York, NY 10022

Bar Biszick
President
Richard Mehr
Public Relations
Music Access, Inc.
90 Fifth Avenue
Brooklyn, NY 11217

Babara Berger Opotowsky President, BBB of Metropolitan NY 257 Park Avenue South NMew York, NY 10010

Eileen E. Huggard
Deputy General Counsel
NY City Dept. of
Telecommunications & Energy
25 Park Place
New York, NY 10007

Patrick A. Lee William J. Balcerski NYNEX 1120 Bloomingdale Road White Plains, NY 10605

James P. Tuthill John W. Bogy Pacific Bell & Nevada Bell 140 New Montgomery St., Room 1522-A San Francisco, CA 94105 Stanley J. Moore Pacific Bell & Nevada Bell 1275 Pennsylvania Ave., N.W. Washington, D.C. 20004

Linda C. Smith Assistant Counsel Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17120

Michael B. Day Edward W. O'Neill Ellen S. LeVine People of the State of California 322 8th Avenue & the PUC of the State of New York, NY 10001 California 505 Van Ness Ave. San Francisco, CA 94102

Chris Sutherland Promotion Marketing Association of America, Inc.

Josephine S. Trubek, Esq. General Counsel Rochester Telephone Corp. Rochester Tel Center 180 S. Clinton Ave. Rochester, NY 14646-0700

Diane Dean Assistant Counsel State of NY Dept. of Public Service Three Empire State Plaza Albany, NY 12223

John Richeson Senior Account Manager TEL Control, Inc. P.O. Box 4087 Huntsville, AL 35815-4087 Gregory M. Casey Senior VP & General Counsel Telesphere-Wiltel 655 W. Grand Ave., Ste. 300 Elmhurst, IL 60126-1006

Brad E. Mutschelknaus Rachel J. Rothstein Wiley, Rein & Fielding 1776 K Street, N.W. Washington, D.C. 20006 Mary Sue Terry Attorney General Commonwealth of Virginia 101 N. 8th St. Richmond, Virginia 23219

George C. Davis
Assistant General Counsel
Consumer Protection Division
United States Postal Service
475 L'Enfant Plaza SW
Washington, D.C. 20260-1100

Leon M. Kestenbaum
Lesla Lehtonen
Jay Keithley
David Matson
United Telecommunications, Inc.
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036

Mary McDermott General Counsel United States Telephone Assoc. 1401 H Street, N.W. - Ste. 600 Washington, D.C. 20005-2136 Lawrence E. Sarjeant Kathryn Marie Krause 1020 19th St., N.W. Suite 700 Washington, D.C. 20036

Hubert T. Humphrey, III
Attorney General
State of Minnesota
340 Bremer Tower
Seventh Place & Minnesota St.
St. Paul, Minnesota 55101

Howard J. Braun
Jerold L. Jacobs
Rosenman & Colin
Island Broadcasting Co.
1300 19th St., N.W.
Suite 200
Washington, D.C. 20036

James P. Tuthill
Nancy K. McMahon
Attorneys for Pacific Bell
2600 Camino Ramon, Rm. 2W852
San Ramon, CA. 94583

Alan F. Ciamporcero Attorney for Pacific Bell 1275 Pennsylvania Avenue, N.W. Washington, D.C. 20004

Lee A. Marc Summit Telecommunications Corp. 1640 South Sepulveda Blvd. Suite 207 Los Angeles, CA. 90025 Frost & Jacobs Counsel for Cincinnati Bell 2500 PNC Center 201 E. Fifth Street Cincinnati, OH. 45202 Southern New Enland Telephone Co.
Rochelle D. Jones
Director-Regulatory
227 Church Street
New Haven, CT. 06510

William J. Cowan General Counsel New York State Dept. of Public Service Three Empire State Plaza Albany, NY 12223

Cellular Telecommunications
Industry
Michael F. Altschul
Michele C. Farquhar
Brenda K. Pennington
Two Lafayette Centre, Suite 300
1133 Twenty-First Street, N.W.
Washington, D.C. 20036

Tele-Publishing, Inc. Peter J. Brennan Director of Development 126 Brookline Avenue Boston, MA. 02215

Pilgrim Telephone, Inc. Walter Steimel, Jr. Fish & Richardson 601 13th Street, N.W. Fifth Floor North Washington, D.C. 20005 National Assoc. of Regulatory Utility Commissioners Paul Rodgers Charles D. Gray James Bradford Ramsay 1102 ICC Building, P.O. Box 684 Washington, D.C. 20044

MCI Telecommunications Corp.
Mary J. Sisak
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Ken McEldowney
Executive Director Consumer
Action
116 New Montgomery Street, Suite
233
San Francisco, CA. 94105

GTE Service Corp. Attorneys Ward W. Wueste, Jr. Richard McKenna P.O. Box 152092 Irving, TX. 75015-2092

Gail L. Polivy Attorney for GTE 1850 M Street, N.W. Suite 1200 Washington, D.C. 20036 National Assoc. of Consumer South Carolina Telephone Co. Agency Administrators Agency Administrators 1010 Vermont Avenue, N.W. Suite 514 Washington, D.C. 20005

John W. Hunter McNair & Sanford, P.A. 1155 Fifteenth Street, N.W. Washington, D.C. 20005

Peter Arth, Jr. Edward W. O'Neill Timothy E. Treacy Attorneys for the People of the State of California 505 Van Ness Avenue San Francisco, CA 94102

Seham, Klein & Zalman Attorneys for Assoc. of Information Providers of New York Info Access Joel R. Dichter Jane B. Jacobs 485 Madison Avenue New York, NY 10022

Attorneys for American Telephone & Telegraph Francine J. Berry R. Steven Davis Peter H. Jacoby 295 North Maple Ave., Rm. 3244J1 Basking Ridge, NJ 07920

The National Association for Information Services William W. Burrington, Esq. 1250 Connecticut Avneue, N.W. Suite 600 Washington, D.C. 20036-2603

Edwin N. Lavergne, Esq. Rodney L. Joyce, Esq. Jay S. Newman, Esq. Ginsburg, Feldman & Bress, Chartered 1250 Connecticut Ave. NW, Suite 800 Washington, D.C. 20036-2603

Albert H. Kramer Robert F. Aldrich Douglas E. Rosenfeld Keck, Mahin & Cate 1201 New York Avenue, N.W. Penthouse Suite Washington, D.C. 20005-3919

Leon M. Kestenbaum Sprint Corporation 1850 M Street N.W., Suite 1100 Washington, D.C. 20036

Larry D. Lomaz 900 America 1 Cascade Plaza Suite 1940 Akron, Ohio 44308 Werner K. Hartenberger
Dow, Lohnes & Albertson
Attorney for Cox Enterprises,
Inc.
1255 23rd Street, N.W., Ste. 500
Washington, D.C. 20037